



The Association of State Wetland Managers, Inc.

"Dedicated to the Protection and Restoration of the Nation's Wetlands"

June 7, 2013

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Dr. Thomas Armitage, Designated Federal Officer
U.S. EPA Science Advisory Board (1400R)
1200 Pennsylvania Ave., NW
Washington, D.C. 20460

RE: Comment on the List of Candidates for the EPA Science Advisory
Board Panel for the Review of EPA's Water Body Connectivity Report

Dear Dr. Armitage:

The Association of State Wetland Managers strongly supports a science based approach to defining the scope of waters of the United States, which rests in part on the definition of connectivity of headwater streams, wetlands, and other waters. Decisions made by the EPA will have a major impact on our member states and tribes in their interface with federal regulatory programs. Therefore, we appreciate the opportunity to provide comments regarding candidates for the Science Advisory Board that will review EPA's draft science synthesis report on connectivity of waters.

We support the technical qualifications and other criteria for selection of advisory board members as defined in the *Federal Register* notice. In addition, our support for specific candidates is based on our knowledge that they meet the following criteria which will help to ensure the strongest possible scientific input to support future decisions on wetland and headwater jurisdictional issues.

- Significant experience in applied science with an emphasis on freshwater wetlands and headwater streams. The SAB must be able to evaluate the practicable applicability of science-based criteria for potential use by front-line wetland managers;
- Ideally, some familiarity with Clean Water Act §404 and related state/tribal dredge and fill policies and regulations. The perspective of the SAB must include an understanding of the legal context of the review.
- Ability to objectively evaluate a broad range of research findings, and to identify the results most applicable to and useful for development of national policy or procedures.

The ability to clearly and accurately explain scientific findings to those without the same degree of technical knowledge.

From this perspective, we strongly support the following nine candidates from among the many exceptional individuals nominated for this SAB. Our association members have had personal interactions with these individuals; we are familiar with their research and contributions to wetlands and associated aquatic systems over a long period of years, and believe that they will be outstanding contributors to the SAB. We recommend, in alphabetical order:

Dr. Derek Booth. Dr. Booth is a well-known and respected geologist/geomorphologist and an expert in the evaluation, management, and restoration of systems that are altered by human activity. He has worked closely with ASWM member states to develop a watershed assessment and management tool, and also has an outstanding background as an educator both in the collegiate environment and in professional symposia.

Dr. Robert Brooks. Dr. Brooks has extensive experience in many aspects of wetland ecology and wetland assessment. He excels at understanding how various waters are linked within the watershed, and how these interactions impact the overall integrity of the watershed. He has worked extensively with states and other resource managers who make practical use of his work.

Mr. John Dorney. Mr. Dorney has substantial on the ground experience in dredge and fill programs, and was directly involved with developing procedures for regulatory boundaries for the state of North Carolina, particularly for small stream systems. He has been an active member of the ASWM for many years, participating in numerous meetings and conferences; other stream and wetland managers have benefited greatly from his expertise.

Dr. Siobhan Fennessey. Dr. Fennessey's work in wetland ecology and in the evaluation of wetland systems is nationally recognized. Her research is not only meticulous, but has direct application in state and tribal programs. She communicates technical information clearly and in a positive manner.

Dr. Scott Jackson. Dr. Jackson's work on designing standards for road-stream crossing structures, including assessing and redesigning existing structures has had a significant and positive impact on highway design for wildlife passage. His extensive experience with streams, wetlands and other aquatic landscapes make him uniquely qualified to evaluate river, stream and wetland connectivity.

Dr. William Mitsch. Few wetland scientists are as broadly recognized nationally and internationally as Dr. Mitch. Among other topics, he has worked extensively to clarify the relationship between upstream wetlands and downstream waters in systems on a very large scale. He has a very deep understanding of both water quality and water quantity issues associated with wetlands and stream management. He is very cognizant of cutting edge issues, and in all of his work focuses on translating theory into on the ground solutions.

Dr. Margaret Palmer. Dr. Palmer has done extensive research in the areas of stream ecology and hydrology including complex groundwater interactions. She has worked extensively on wetland restoration and wetland influence and connectivity to intermittent and perennial streams.

Dr. Donald Uzarski. Dr. Uzarski is both an outstanding research scientist and an excellent teacher. He has demonstrated the ability to identify useful metrics among endless possibilities in monitoring of the Great Lakes, and moreover can effectively explain the statistical and scientific basis of these metrics to policy makers and other non-specialists. He has a demonstrated ability to collaborate effectively with diverse groups of specialists, including both research scientists and government agencies.

Dr. Scott Yaich. Dr. Yaich combines a pragmatic approach to wetland management and understanding of aquatic ecosystems with an exceptional ability to work with a wide range of interest groups and stakeholders. He is engaging, articulate, and thoughtful, and would elevate interactions of the committee.

We strongly believe that all of these scientists bring the technical expertise, national experience, and communication skills necessary to enhance the work of the SAB. We look forward to the completion of EPA's report, including its review by the board, with the goal of more effectively addressing pressing regulatory issues.

We appreciate the opportunity to support these individuals. Please feel free to contact me (jeanne.christie@aswm.org, or 207-892-3399) should you wish to discuss these candidates.

Sincerely,

A handwritten signature in black ink, reading "Jeanne Christie". The signature is fluid and cursive, with the first name "Jeanne" and last name "Christie" clearly distinguishable.

Jeanne Christie, Executive Director
Association of State Wetland Managers

Cc: Peg Bostwick, ASWM